

FILED

August 18, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

BY: DM
DEPUTY

JUSTIN X. HALE
Plaintiff,

V.

**JAMIE MCGREGOR, DIRECTOR OF
TRAINING & EDUCATION USA RUGBY
AND
USA RUGBY**
Defendants.

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CASE NO. 1:2024cv01076

PLAINTIFF'S COURT ORDERED THIRD AMENDED COMPLAINT

COMES NOW Plaintiff Justin X. Hale and files this Third Amended Complaint against Defendants Jamie McGregor and USA Rugby, seeking monetary, injunctive, and declaratory relief for race discrimination, association discrimination, and retaliation in violation of 42 U.S.C. § 1981.

Nature of the Action. This case asserts federal claims under 42 U.S.C. § 1981 for race discrimination, association discrimination, and retaliation in contracting. Plaintiff does not assert any claim under the Ted Stevens Olympic and Amateur Sports Act and does not challenge any eligibility ruling. He remains certified. No internal grievance procedure applied to the personal tort and civil rights harms alleged here.

I. INTRODUCTION

1. Plaintiff Justin X. Hale (Hale), a highly qualified rugby referee recognized at both national and international levels, brings this action to address discriminatory, retaliatory, and tortious actions taken against him by Defendants Jamie McGregor and USA Rugby. These actions, rooted in racial bias and retaliation for Plaintiff's participation in NCR sanctioned events, have caused significant financial, emotional, and professional harm.
2. Plaintiff Justin X. Hale, based in Sequin, TX, became a rugby referee in 2017, following a successful playing career as a Division 1 athlete in both 7s and XVs rugby. As he transitioned from player to referee, Hale quickly gained recognition, officiating over 30 matches per year in the early stages of his career. Soon senior referees advised him that continuing to play could hinder his advancement as a referee in the eyes of decision-makers, so by 2020, he shifted his focus entirely to refereeing and coaching. This transition led to more opportunities, and by 2021 he refereed in his first championship series through National Collegiate Rugby (NCR).
3. In 2021, Hale was accepted into the USA Rugby Regional Development Group (RDG), composed of the top 100 referees in the country, where the focus is on identifying and advancing referees with potential for higher level competitions. RDG members are selected based on their foundational skills, commitment to development, and willingness to take on regular assignments. The goal of the RDG is to maintain equitable representation across regions and support referees' progression through the Pathways program. The same year he was

also contracted with USA Rugby to work as an Assistant Referee for the USA Rugby Club XV's National Championship.

4. In 2022, Hale contracted with USA Rugby to work as the lead match official for the USA Rugby D1AA National Championship, USA Rugby Club 7s National Championship, and the USA Rugby Collegiate National Championships (CRAA). Hale was also contracted as an Assistant Referee (AR) for Rugbytown 7s, the most notable professional 7s competition in the U.S. During that competition, he became the first AR to be selected as the lead match official for the honored Military Final. Hale also contracted with NCR to work as the lead match official for the XV's National Championship, and as a match official at the Collegiate Rugby Championships, the largest and most prestigious collegiate 7s championship in the nation.
5. On August 26, 2023, Plaintiff Justin X. Hale was selected to join the National Development Group (NDG) for the 2023 2024 season (Exhibit O). The NDG is a distinguished pool of approximately 40 referees from across the United States identified by USA Rugby's Pathways Working Group for their potential and performance at the national level.
6. The NDG program is designed to foster the growth and development of top tier referees through tailored coaching, fitness support, and enhanced officiating opportunities.
7. Plaintiff's selection to the NDG underscores his exceptional qualifications as a referee, as well as his commitment to continuous improvement and contributions to the rugby officiating community. As a member of the NDG, Plaintiff also committed to meeting rigorous

professional standards, including attending regional development meetings, completing match reviews and season development plans, maintaining fitness benchmarks, and mentoring junior referees within his Local Referee Organization (LRO).

8. In 2023, Hale contracted with Major League Rugby (MLR), the highest professional rugby league in the United States, as an Assistant Referee (AR), where he worked to 5 matches in his first season and was recognized as one of the top emerging ARs. During this year, he fully dedicated himself to officiating, covering over 215 matches, including 135 as the lead Match Official, traveling over 12,000 miles by car and flying nearly 20,000 miles. His dedication and investment, totaling nearly \$10,000, significantly enhanced his refereeing skills and expertise. Hale was also invited by Nick Ricono, the USA Rugby 7s Referee Manager, to be a part of the HSBC 7s official match referee crew. This event is the highest level of 7s competition in the world that helps to determine teams for Olympic competition.
9. Notably, Hale has been contracted to referee prestigious competitions both domestically and internationally. Several of those contracts were with USA Rugby. Hale has officiated competitions such as USA 7s Men's and Women's Olympic Trials (2024), which included Canada Women's 7s and Japan Men, Coral Coast 7s in Fiji (2024), Rugbytown 7s in Denver(2022-2024), the USA Club XVs National Championship (2021), Major League Rugby (2023), and Papeete International 7s (2024).
10. In addition, Hale serves as the Regional Development Officer (RDO) for his local union, overseeing training and development of referees. As a member of the referee community, Hale

also coaches youth and adult rugby players. He was also selected by USA Rugby in 2023 to lead a two-day Assistant Referee course for both RDG and NDG (National Development Group) members, as well as a Referee Coach for National Intercollegiate Rugby Association (NIRA). His commitment to refereeing excellence has allowed him to officiate at the highest levels of the sport.

11. Defendant Jamie McGregor is the Director of Training & Education at USA Rugby National Office, his office is in Denver, Colorado, and can be served at 2655 Crescent Dr., Lafayette, CO 80026. He can be reached at (720) 322-3114 and jmcgregor@usa.rugby
12. Defendant USA Rugby Corporation based in Colorado, with its principal place of business at 2655 Crescent Dr., Lafayette, CO 80026. USA Rugby can be served through its registered agent, A Registered Agent, Inc. at 8 The Green, Ste A, Dover, DE 19901.
13. Additional relevant parties within USA Rugby may include College Rugby Association of America (CRAA) and Major League Rugby (MLR).

II. JURISDICTION

14. Jurisdiction and Venue. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1343(3)–(4) because this action arises under 42 U.S.C. § 1981 (and, for Count IV, 42 U.S.C. § 1985(3), if retained). Venue is proper in this District under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to these claims occurred here, including assignment decisions directed into Texas and the resulting injury felt here. In the alternative, this Court has diversity jurisdiction under 28 U.S.C. § 1332(a) because the parties

are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

14.1. Plaintiff's Citizenship: Plaintiff Justin X. Hale is a citizen of the State of Texas, residing in Seguin, Texas.

14.2. Defendant's Citizenship: Defendant Jamie McGregor is a citizen of the State of Colorado. Defendant USA Rugby is incorporated under the laws of Delaware and maintains its principal place of business at its headquarters located in Glendale, Colorado.

15. The amount in controversy in this matter exceeds \$75,000. Plaintiff has suffered significant financial, professional, and emotional damages as a direct result of Defendants' actions, including:

15.1. Financial Losses: Plaintiff was excluded from officiating high profile rugby events, including Major League Rugby (MLR) matches, Collegiate Rugby Association of America (CRAA) championships, and other nationally significant competitions. These exclusions resulted in lost officiating fees, travel reimbursements, and associated professional income.

15.2. Reputational Harm: Defendants' actions have caused severe damage to Plaintiff's professional reputation in the rugby officiating community, reducing his ability to secure future officiating assignments and impairing his career trajectory.

- 15.3. Emotional Distress: Plaintiff has experienced severe emotional distress, including anxiety, sleeplessness, and diminished personal and professional well being, attributable to the retaliatory and discriminatory treatment by Defendants.
- 15.4. Professional Setbacks: Costs associated with rebuilding Plaintiff's professional career, including lost opportunities for advancement, developmental training, and related expenses, are valued at an additional \$25,000 or more.
16. These cumulative damages well exceed the \$75,000 threshold required to establish diversity jurisdiction.
17. Defendants' Principal Place of Business Defendant USA Rugby's principal place of business is located at 501 S. Cherry St., Glendale, Colorado. This is supported by publicly available information, including corporate filings and the official USA Rugby website, which list Colorado as the headquarters and operational hub for its activities. Defendant Jamie McGregor resides and operates in the State of Colorado, where he serves in his capacity as Director of Training and Education at USA Rugby.

III. STATEMENT OF FACTS

18. The following factual allegations demonstrate a pattern of discriminatory and retaliatory behavior by Defendants, culminating in substantial harm to Plaintiff's career and reputation.
19. Plaintiff Justin X. Hale is an experienced rugby referee affiliated with the Lonestar and Texas Rugby Referee Associations, two certified Local Referee Organizations.
20. Hale is a 1099 independent contractor with extensive experience in refereeing for Major League Rugby (MLR) and other competitions throughout the United States and abroad.

- 20.1. Plaintiff acknowledges his status as an independent contractor, performing services under 1099 contracts. However, the level of control exercised by USA Rugby over Plaintiff's refereeing opportunities goes beyond the bounds of a traditional independent contractor relationship. USA Rugby exercises significant influence over referee appointments, career progression, and professional development. This is evidenced by USA Rugby's financial contributions to the salary of the MLR Referee Manager, which creates a vested interest in MLR's refereeing decisions. Furthermore, the dual role of David Wilkinson, the MLR Referee Manager under USA Rugby's oversight, illustrates the control USA Rugby wields in decisions directly affecting Plaintiff's career.
21. From April 28-30, 2023, Hale contracted as a referee at the Collegiate Rugby Championships ("CRCs") in Washington, D.C., an opportunity to officiate high level matches and advance his refereeing career.
22. The CRCs are a national championship level rugby tournament for collegiate rugby organized and operated by National Collegiate Rugby ("NCR").
23. NCR operates as a parallel collegiate rugby association to the Collegiate Rugby Association of America (CRAA). CRAA is recognized by Defendant USA Rugby.
24. On March 18, 2023, Hale was offered a contract to participate as a referee at the CRAA 7s Championship. *See Exhibit A*. Hale accepted that offer and a binding contract was formed. *See id.*

25. On May 1, 2023, following his CRC work, Hale was informed by phone that his CRAA 7s Championship appointment was canceled because of his CRC participation. *See Exhibit B and Exhibit P.*
26. The CRAA terminated Hale's contract based on malicious, and false statements of fact, communicated to them by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, including disparaging remarks about Hale's personal character and performance as a referee.
27. Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, had actual knowledge that the statements communicated to CRAA were malicious, false and made with reckless disregard for the truth.
28. This decision to terminate Hale's contract was communicated by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, and did not provide Hale an opportunity to appeal the decision or otherwise address the matter.
29. During the May 1, 2023 McGregor informed Plaintiff that he was disqualified from officiating at the Collegiate Rugby Association of America (CRAA) tournament due to his participation in the Collegiate Rugby Championships (CRCs), an event hosted by National Collegiate Rugby (NCR) and not sanctioned by USA Rugby. McGregor stated, "No, it's not going to change anything," effectively terminating Plaintiff's CRAA contract without any opportunity for appeal.
30. McGregor cited USA Rugby's ongoing "schism" with NCR as the basis for this exclusion, emphasizing that USA Rugby would prioritize referees who aligned with its interests. Despite

Plaintiff's request for clarification and written documentation, McGregor admitted, "There is no written rule, but this is the way it works."

31. During the call, Plaintiff also questioned why other referees who officiated NCR events, faced no repercussions and, in some cases, were promoted within USA Rugby. McGregor failed to provide a consistent explanation, further underscoring the arbitrary and discriminatory nature of his actions.
32. This phone call, documented in the transcript attached as Exhibit B and supported by the accompanying audio recording submitted as Exhibit P, demonstrates clear retaliatory intent and a deliberate effort to harm Plaintiff's career. It also highlights USA Rugby's inconsistent and racially biased enforcement of its alleged policies.
33. On March 15, 2024, Hale emailed David Wilkinson, Head Referee Manager for Major League Rugby (MLR). *See Exhibit C.*
34. MLR is a professional rugby league, with teams based in the United States and Canada.
35. On March 15, 2024, in response to Hale's email, he was told that he could not be awarded any contacts to MLR matches until he "spoke to Jamie." *Id.*
36. Hale was thus denied the opportunity to contract with the MLR matches due to communications from Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, concerning Hale's participation in NCR events.
37. On March 25, 2024 Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, informed Hale through a Zoom (Exhibit N) video call, witnessed by Marquise

Goodwin, Hale was being denied the opportunity to contact with the MLR, because of his participation in the CRCs and other “high profile” NCR events.

38. During the meeting, Goodwin asked what steps would be necessary for the Plaintiff to regain eligibility for officiating Major League Rugby (MLR) matches. Defendant McGregor stated that Plaintiff would need to refrain from participating in high profile NCR events, including the Collegiate Rugby Championships (CRCs). When Plaintiff asked what Defendant McGregor could guarantee in return for this compliance, McGregor admitted that he could guarantee nothing, but then he would consider adding him back to “the list.”
39. Plaintiff warned Defendant McGregor that his actions were likely illegal, citing the unfairness of attempting to control referees' professional choices without justification or compensation, as well as, other referees, teams, coaches, and contracted workers participating in the same events. Defendant McGregor dismissed these concerns, insisting that his management style and USA Rugby's funding of referees justified his authority to dictate referees' activities. Plaintiff rebutted that referees bear the majority of costs themselves, including registration fees, travel expenses, and other professional costs, and that USA Rugby's control over referees was unjustified.
40. This conversation highlights Defendant McGregor's arbitrary and retaliatory approach to managing referees, particularly Plaintiff, and further illustrates the discriminatory and retaliatory intent behind his actions.

41. From April 25-28, 2024, Plaintiff Justin X. Hale performed under a contract with NCR to referee at the 2024 Collegiate Rugby Championships (CRCs).
42. From June 20-22, 2024, Plaintiff Justin X. Hale was invited by Marquise Goodwin to officiate scrimmages for the USA 7s Men, USA 7s Women, Canada 7s Women, and Japan 7s Men, as they prepared for the 2024 Olympics in Paris. Hale officiated matches and also coached/reviewed a high profile USA Rugby referee. Hale had previously accepted this invitation and informed Nick Ricono, the USA Rugby 7s Referee Manager, of his participation during a conversation at a separate tournament a week earlier. Ricono expressed no objections to Hale's involvement. Hale traveled and made accommodations using his own funds.
43. On July 1, 2024, Nick Ricono, the Head Referee Manager for USA Rugby 7s competitions, acting on behalf of and at the direction of USA Rugby, informed Hale that he was not receiving a contract from USA Rugby to referee at Club National 7s 2024 due to his lack of complying with management directive "*even if we don't agree with them.*" The referenced management directive was issued by Jamie McGregor in reference to Hale's participation as a referee at the CRCs and other NCR events. *See Exhibit D.*
44. Thus, Hale was denied an opportunity to contract with USA Rugby to referee at Club National 7s 2024 due to communications from Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, referencing Hale's participation in NCR events.

45. Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, had actual knowledge that the statements he communicated to Nick Ricono were malicious, false and made with reckless disregard for the truth.
46. As a result of the multiple acts of malicious, false, and reckless behavior of Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, Hale was denied other significant refereeing contracts, including with MLR, Rugby Texas for the Texas D1 High School Championship, the USA Club Regionals in Orlando 2023. *See* Exhibit E. and MLR contracts. *See* Exhibit E
47. Denial of these contracts has caused concrete financial loss, significant emotional distress, and professional setbacks.
48. In further support of the claims of discrimination as outlined in this amended complaint, Plaintiff Justin X. Hale presents additional evidence and comparative analyses demonstrating discriminatory treatment based on race. This evidence includes documented instances where referees of a different race, under similar circumstances, received preferential treatment and faced no career impediments, unlike Plaintiff.
49. Notably, white referees such as Mike Lawrence, Tom Champa, and Alex Hedquist, who participated in the same or similar Collegiate Rugby Championship (CRC) and National Collegiate Rugby (NCR) events as Plaintiff, faced no reprimands or career impediments. In stark contrast, Plaintiff was excluded from refereeing opportunities and faced unwarranted punitive measures. This differential treatment was evident despite the absence of any formal or

documented policy that would justify such disparate treatment based on participation in said events.

49.1. April 28-30, 2023: Abigail M. Tobias, along with Michael Lawrenson, Ben Dickenson, Thomas Ciampa, Alex Hedquist, and Andrew Dunn, is contracted to referee at CRCs hosted by NCR. *See* Exhibit K.

49.2. May 6, 2023: Abigail Tobias officiates at the 2023 CRAAs in Houston, TX.

49.3. March 2 - June 29, 2024: Michael Lawrenson, Ben Dickenson, Thomas Ciampa, Alex Hedquist, and Andrew Dunn are contracted to referee in the MLR. *See* Exhibit L.

50. Further compounding this discriminatory practice, evidence shows that Amelia Luciano, another white referee who participated in high profile NCR events, not only avoided any punitive actions but was subsequently granted opportunities to officiate in Major League Rugby (MLR) matches. This was corroborated by her appearance as a referee in a widely viewed NCR tournament that was live streamed on a popular sports platform, further highlighting the inconsistencies in enforcement applied to Plaintiff.

50.1. April 6, 2024: Amelia Luciano officiates a high profile NCR tournament, which is streamed live on the 2024 MLR Champions New England Freejacks' YouTube channel. *See* Exhibit I

50.2. April 10, 2024: Amelia Luciano is contracted as a referee for an MLR match. *See* Exhibit J.

51. Additionally, the advancement of Matt Lake, a White referee who has publicly criticized the organizational practices concerning referees but faced no professional repercussions, instead

receiving promotions and opportunities, underscores a pattern of racial bias. Mr. Lake's criticisms, similar in nature to the grievances raised by Plaintiff, did not impede his career growth, illustrating a clear racial disparity in handling disputes and criticisms within the refereeing community.

51.1. May 12, 2023: Matt Lake publicly criticizes USA Rugby's practices and details his participation in NCR events, such as the CRCs. *See* Exhibit F.

51.2. May 4, 2024: Matt Lake serves as the lead match official for an international test match representing USA Rugby. *See* Exhibit G.

51.3. June 25, 2024: Matt Lake is appointed as the Chair of the USA Rugby Referees Development Working Group. *See* Exhibit H

52. These instances and comparisons are supported by multiple exhibits newly included in this filing, specifically Exhibit F (public criticism by Matt Lake), Exhibit I (Amelia Luciano refereeing an NCR event), Exhibit J (Amelia Luciano's first MLR appointment), and Exhibit K (list of referees at 2023 CRCs). These documents and factual accounts collectively demonstrate a systemic issue of racial discrimination that has adversely affected Plaintiff's career and professional standing, necessitating judicial intervention.

53. Plaintiff further alleges disparate treatment compared to white referees who also officiated NCR events. Despite similar participation, those referees faced no punitive measures and, in several instances, advanced within USA Rugby and Major League Rugby without impediment. Exhibits [Y] and [Z] provide examples of post NCR assignments and promotions for these comparators. This differential treatment supports a plausible inference that, but for

Plaintiff's race, he would not have been denied the same contracting opportunities, in violation of 42 U.S.C. § 1981.

54. Plaintiff Justin X. Hale seeks to clarify the nature of the rugby events involved in this litigation, specifically regarding their sanctioning bodies. The events at issue include local and national NCR events, which are sanctioned by the National Collegiate Rugby (NCR), an entity distinct from USA Rugby. Contrary to assertions possibly made by the defendant, these events were conducted under the auspices of a recognized sanctioning body, and participation in such events is a common and accepted practice within the rugby refereeing community.
55. The need for this clarification arises from potential misrepresentations by the defendant, Jamie McGregor, who may have implied or stated that Plaintiff's involvement in these NCR sanctioned events was unauthorized or in violation of USA Rugby policies. Such misrepresentations have directly impacted Plaintiff's professional opportunities and reputation, as they were used to justify adverse actions including but not limited to exclusion from refereeing assignments and public denouncements.
56. Clarifying the sanctioning status of these events is essential to counter the defendant's unfounded allegations and demonstrate that Plaintiff's professional conduct was in line with the normative standards of his profession. The factual distinctions concerning event sanctioning underscore the baselessness of the defendant's actions and support Plaintiff's claims of wrongful and discriminatory treatment.
57. Contrary to Defendant's denials, documented evidence clearly demonstrates McGregor's direct involvement and knowledge of the implications of Plaintiff's participation in NCR

events on his USA Rugby related opportunities. This includes emails and recorded communications where Defendant explicitly advises against Plaintiff's participation in NCR events due to potential consequences within USA Rugby, highlighting a selective enforcement of non-existent policies against Plaintiff, aimed at detrimentally impacting his professional trajectory.

58. USA Rugby exerts substantial influence over the contracting and management of referees across various rugby competitions, including the Major League Rugby (MLR) and the College Rugby Association of America (CRAA). This influence is manifest in the financial and administrative arrangements that place USA Rugby at a controlling position within these organizations. Specifically, USA Rugby contributes to the salary of the MLR Referee Manager, thereby creating a vested interest in the operations and decisions regarding referee appointments within MLR. This arrangement gives USA Rugby, and by extension Jamie McGregor, significant control over refereeing opportunities within MLR.
59. David Wilkinson, the MLR Referee Manager, operates under the dual oversight of USA Rugby and MLR, which complicates his autonomy in referee selection and management. His statement that his "hands are tied" due to his dual role underscores the direct influence USA Rugby and McGregor wield over MLR's refereeing decisions. This interconnectedness extends to the College Rugby Association of America (CRAA), a USA Rugby sanctioned competition, where similar control is exercised over referee appointments and career advancements. The CRAA encompasses premier divisions within both men's and women's

collegiate rugby, including Men's D1A, Men's D1AA, Men's D2, Women's D1A, Women's D1, and Women's D2.

60. This structure of influence and control not only centralizes decision making but also places significant power in the hands of USA Rugby and Jamie McGregor to impact referees' careers adversely, as evidenced by the discriminatory practices and inconsistencies in the treatment of referees based on their participation in events outside of USA Rugby's direct purview.
61. At all relevant times McGregor acted with actual and apparent authority for USA Rugby with respect to referee assignment and evaluation. USA Rugby is liable for McGregor's violations of § 1981 under principles of agency and respondeat superior and through ratification.

IV. FEDERAL LEGAL CLAIMS

Count I – Race Discrimination under 42 U.S.C. § 1981

Issue

Whether Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, denied Plaintiff Justin X. Hale the same contractual opportunities enjoyed by similarly situated white referees because of his race, in violation of 42 U.S.C. § 1981.

Rule

Section 1981 guarantees all persons the right “to make and enforce contracts...as is enjoyed by white citizens.” 42 U.S.C. § 1981(a), (b). To plead a § 1981 discrimination claim a plaintiff must allege: (1) membership in a protected class, (2) an adverse action affecting a contractual right, and (3) a causal connection between race and that adverse action. These standards are evaluated under the plausibility framework of *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007), and *Ashcroft v. Iqbal*, 556 U.S. 662 (2009). Section 1981 race-discrimination claims require but for causation. *Comcast Corp. v. National Association of African American Owned Media*, 140 S. Ct. 1009, 1014–15 (2020). The statute protects a plaintiff’s own contracting rights. *Domino’s Pizza, Inc. v. McDonald*, 546 U.S. 470, 476–80 (2006).

Application

1. **Protected Class:** Plaintiff Justin X. Hale is Black, a protected class under § 1981.
2. **Adverse Actions by Jamie McGregor and USA Rugby:**

- They blocked Plaintiff from paid assignments and removed him from Major League Rugby contracts without any eligibility finding, informing him he would receive no further MLR contracts “until you speak to Jamie.”
- They cancelled Plaintiff’s 2023 CRAA 7s Championship assignment in Houston after implying he was ineligible because of his participation in events not sanctioned by USA Rugby.
- They refused to appoint Plaintiff to the 2024 Club National 7s Championship, citing “lack of complying with management directive” tied to his NCR participation.

3. Causal Connection / Disparate Treatment:

Defendants’ statements tie adverse actions to Plaintiff’s work with NCR. When those statements are considered together with specific comparator allegations showing that similarly situated white referees who also worked NCR or the same college events were not penalized, the facts support a plausible inference that, but for Plaintiff’s race, he would not have been denied these contracts. Comcast, 140 S. Ct. at 1014–15. By contrast, similarly situated white referees received or retained USA Rugby and MLR assignments after working the same NCR and college events, including: Mike Lawrence, Tom Champa, Alex Hedquist, Abigail Tobias, Andrew Dunn, Amelia Luciano, and Matt Lake. Examples include:

- **Mike Lawrence, Tom Champa, Alex Hedquist** officiated the same CRC and club events without penalty and retained their USA Rugby and MLR contracts.

- **Abigail Tobias, Andrew Dunn** worked CRCs then officiated CRAA 7s and MLR matches with no interference.
- **Amelia Luciano** officiated a high profile NCR tournament and immediately received an MLR contract.
- **Matt Lake** publicly criticized USA Rugby and participated in NCR events yet was promoted to Chair of the Referees Development Working Group and served as lead official in an international test.

This pattern of favorable treatment for white referees and unfavorable treatment for Plaintiff supports a reasonable inference of race-based disparate treatment.

Conclusion

Plaintiff has plausibly alleged a race discrimination claim under 42 U.S.C. § 1981.

Count II – Retaliation under 42 U.S.C. § 1981

Issue

Whether Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, retaliated against Plaintiff Justin X. Hale for engaging in protected activity, in violation of 42 U.S.C. § 1981.

Rule

A § 1981 retaliation claim requires allegations of:

1. Protected activity;
2. A materially adverse action; and
3. A causal connection between the protected activity and that adverse action.

Retaliation is actionable under § 1981. Protected opposition activity includes opposing race based discrimination in contracting and asserting the right to make and enforce contracts on equal terms. See *CBOCS West, Inc. v. Humphries*, 553 U.S. 442, 445–46 (2008). Courts apply a but for causation standard to retaliation claims. See *Univ. of Texas Southwestern Med. Ctr. v. Nassar*, 570 U.S. 338, 362 (2013).

Application

1. **Protected activity.** Plaintiff opposed race based exclusion from assignments and asserted his right to equal contracting during a recorded call on May 1, 2023 and again during a Zoom

meeting on March 25, 2024 that was witnessed by Marquise Goodwin. Those complaints are protected opposition activity under § 1981. See CBOCS West, 553 U.S. at 445–46.

2. Adverse actions by Jamie McGregor and USA Rugby.

- On March 15, 2024, Major League Rugby’s head referee manager stated that no further MLR contracts would issue “until you speak to Jamie.”
- On March 25, 2024, McGregor confirmed that Plaintiff’s complaints and his work with NCR were the reasons he was being blocked from MLR and from the Club National 7s Championship.
- Plaintiff’s 2023 CRAA 7s Championship assignment in Houston was cancelled without any eligibility finding.

3. Causal Connection:

- a. After Plaintiff’s protected complaints, Defendants withheld further MLR contracts and removed him from Club 7s. Defendants also tied contracting decisions to Plaintiff’s stance against unequal treatment. Taken together, these facts plausibly support a but for causal link between the protected activity and the adverse actions. See Nassar, 570 U.S. at 362.

Conclusion

Plaintiff has plausibly alleged a retaliation claim under 42 U.S.C. § 1981.

Count III – Association Discrimination under 42 U.S.C. § 1981

Issue

Whether Defendants Jamie McGregor, acting on behalf of and at the direction of USA Rugby, discriminated against Plaintiff Justin X. Hale in contracting by using his association with National Collegiate Rugby as a pretext for race discrimination, in violation of 42 U.S.C. § 1981.

Rule

Section 1981 guarantees all persons the same right “to make and enforce contracts ... as is enjoyed by white citizens.” 42 U.S.C. § 1981(a), (b). A plaintiff must allege: membership in a protected class, an adverse action affecting his contractual rights, and a causal connection. The claim requires but for causation. See *Comcast Corp. v. National Association of African American Owned Media*, 140 S. Ct. 1009, 1014–15 (2020). Section 1981 protects the plaintiff’s own contracting rights. See *Domino’s Pizza, Inc. v. McDonald*, 546 U.S. 470, 476–80 (2006). Discrimination may be proven with differential treatment and pretext.

Application

Plaintiff alleges that Defendants used his association with National Collegiate Rugby as a pretext to impair his own contracting opportunities, while similarly situated white referees who also worked NCR events were not penalized, which supports a race based violation of Section 1981.

Protected class and pretext. Plaintiff alleges that Defendants cited his association with National Collegiate Rugby as the reason to impair his own contracting opportunities. When compared to the

treatment of similarly situated white referees who also worked the same NCR and college events but were not penalized, the alleged reliance on NCR association supports a reasonable inference that race was the real reason.

Protected association fact. Plaintiff officiated the National Collegiate Rugby Championship in June 2023. That professional affiliation was lawful and common among referees.

Adverse actions by Jamie McGregor and USA Rugby.

- Beginning March 15, 2024, Major League Rugby's referee manager stated that no further MLR contracts would issue "until you speak to Jamie."
- On March 25, 2024, in a Zoom meeting witnessed by Marquise Goodwin, McGregor confirmed that Plaintiff's ongoing participation in NCR was the reason for blocking future MLR and Club National 7s assignments.
- Plaintiff's 2023 CRAA 7s Championship appointment in Houston was cancelled on the same stated basis.

Causal Connection / Differential Treatment:

Defendants' statements tie the withholding of contracts to the NCR rationale. By contrast, multiple white referees who worked the same NCR or college events continued to receive USA Rugby and MLR contracts without interference, including Mike Lawrence, Tom Champa, Alex Hedquist, Abigail Tobias, Andrew Dunn, Amelia Luciano, and Matt Lake. These facts permit a plausible

inference that, but for Plaintiff's race, his contracts would not have been withheld, which satisfies Comcast and Twombly and Iqbal.

Conclusion

Plaintiff has plausibly alleged an association discrimination claim under 42 U.S.C. § 1981 because the NCR justification was used as a pretext to deny him contracting opportunities on account of race.

Count IV – Conspiracy to Interfere with Civil Rights under 42 U.S.C. § 1985(3)

Issue

Whether Defendants and their co conspirators agreed to deprive Plaintiff of his Section 1981 contractual rights on account of race by directing third parties to withhold his assignments.

Rule

To state a claim under Section 1985(3), a plaintiff must allege: (1) a conspiracy, meaning a meeting of the minds; (2) motivated by class based, invidiously discriminatory animus; (3) an act in furtherance of the conspiracy; and (4) injury to person or property or deprivation of a right or privilege of a United States citizen. See *Griffin v. Breckenridge*, 403 U.S. 88, 102–05 (1971). The conspiracy may be purely private. The underlying right here is equal contracting under Section 1981.

Application

Pled in the alternative and, to the extent leave is required under Rule 15, Plaintiff alleges that Defendants and persons outside USA Rugby agreed and acted to deprive him of rights secured by Section 1981 because of race.

Conspirators and agreement.

Jamie McGregor reached an agreement with Major League Rugby’s head referee manager, David Wilkinson, that no further MLR contracts would be offered to Plaintiff “until you speak to Jamie.” McGregor also instructed USA Rugby’s High Performance Sevens manager, Nick Ricono, to remove

Plaintiff from high level sevens assignments. These coordinated directives reflect a common plan to block Plaintiff's contracting opportunities. Wilkinson and Ricono executed those directives, acting in concert with McGregor.

Class based animus.

The agreement was motivated by racial animus. McGregor's statements tying assignment decisions to who is "supported," together with the specific allegations that similarly situated white referees who worked the same NCR or college events were not penalized, support a reasonable inference that race was the reason Plaintiff was denied contracts.

Overt acts in furtherance.

The conspirators took concrete steps to carry out the plan, including:

- Withholding MLR contracts beginning in March 2024;
- Removing Plaintiff from the 2024 Club National Sevens Championship;
- Cancelling his 2023 CRAA Sevens appointment at McGregor's direction through Wilkinson and Ricono.

Injury and deprivation

As a direct result, Plaintiff lost match fees and advancement opportunities, suffered reputational harm, and was deprived of the right to make and enforce contracts on equal terms protected by Section 1981.

Intracorporate conspiracy safeguard

To the extent Defendants raise an intracorporate conspiracy bar, the conspiracy included an entity outside USA Rugby, namely Major League Rugby. In the alternative, McGregor acted outside any legitimate scope and with an independent personal stake in the discriminatory deprivation of Plaintiff's rights.

Conclusion

Because these well pleaded facts show a racially motivated agreement and overt acts by multiple actors to deprive Plaintiff of civil rights protected contracting opportunities, Count IV should proceed under 42 U.S.C. § 1985(3).

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Justin X. Hale respectfully requests that the Court enter judgment in his favor and award the following relief:

1. Declaratory relief

A declaration that Defendants violated 42 U.S.C. § 1981 and, if the Court reaches Count IV, 42 U.S.C. § 1985(3).

2. Compensatory damages

An award of two hundred fifty thousand dollars for lost match fees, reputational harm, emotional distress, and other economic and noneconomic losses proximately caused by Defendants' conduct, together with any additional compensatory damages proved at trial.

3. Consequential and restitutionary damages

Compensation for additional financial losses and career setbacks, including:

- a. Professional development costs, including expenses for maintaining and advancing Plaintiff's officiating qualifications and participation in referee training programs and clinics.
- b. Career rehabilitation costs, including fees for reputation repair, communications support, and career counseling.
- c. Lost training opportunities, including the costs of workshops, high level referee clinics, and competitions that Plaintiff was unable to attend because of Defendants' conduct.

4. Equitable and injunctive relief

- a. Reinstatement of Plaintiff to neutral consideration for USA Rugby and Major League Rugby assignments and access to any assignment systems or portals on equal terms.
- b. A permanent injunction prohibiting Defendants and those acting in concert with them from retaliating against Plaintiff or otherwise impairing his ability to make and enforce officiating contracts on equal terms.
- c. An order directing Defendants to purge, correct, and withdraw any records, directives, or communications that suggested Plaintiff was ineligible or should be withheld from assignments, and to circulate a corrective notice to assigners and partner organizations with whom they communicated regarding Plaintiff.
- d. Training and compliance measures that require those who influence referee assignments to complete nondiscrimination and anti retaliation training and to use transparent, objective criteria for assignments.
- e. Sponsorship and nomination for training. Order Defendants to sponsor, nominate, and fully fund Plaintiff's participation in World Rugby pathway programs for which he is eligible, including referee, assistant referee, coach of match officials, performance reviewer, and educator coursework. Defendants must pay all associated registration fees, travel, lodging, and examination costs. Defendants must provide the standard letters of support and any internal endorsements ordinarily required for nominations, and must not oppose or obstruct Plaintiff's candidacy.
- f. Equal access to training selection. Order Defendants to adopt and publish transparent selection criteria and an application window for referee training and education

nominations. The criteria must be objective and applied to all candidates without regard to race or protected activity. Defendants must keep records of applications and decisions and must produce those records upon reasonable request during the monitoring period.

- g. Corrective notice regarding standing. Order Defendants to issue a written notice to referee assignment and education leadership, including Major League Rugby and any partner assigners, confirming that Plaintiff is in good standing, remains certified, and is to be considered for assignments and nominations on equal terms.
- h. Make whole training plan. Order Defendants, within thirty days of judgment, to submit a plan that identifies appropriate courses and tournaments that will restore Plaintiff's lost development opportunities and to provide the necessary nominations and funding so that Plaintiff can complete those items within twelve months, subject to external seat availability.
- i. Monitoring and retention of jurisdiction. Order Defendants to file two compliance reports during a twelve month monitoring period that summarize assignment decisions affecting Plaintiff, training nominations extended to Plaintiff and to others, and the status of the make whole plan, and retain jurisdiction for at least twelve months to resolve compliance issues.

5. Nominal damages

An award of nominal damages if the Court determines that any category of compensatory damages is not proved, so that Plaintiff's federal rights are vindicated.

6. Punitive damages

An award of punitive damages in an amount to be determined at trial to punish and deter willful and malicious violations of federal civil rights.

7. Attorneys' fees and costs

An award of reasonable attorneys' fees, expert fees, and costs under 42 U.S.C. § 1988 and Federal Rule of Civil Procedure 54(d).

8. Prejudgment and postjudgment interest

An award of interest on all monetary amounts at the highest lawful rate from the date of injury until paid in full.

9. Such other and further relief

Any additional legal or equitable relief that the Court deems just and proper.

VI. JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

VII. CONCLUSION

For the reasons stated above, Plaintiff has properly pleaded federal claims for race discrimination, association discrimination, and retaliation under 42 U.S.C. § 1981, and, if reached, conspiracy under 42 U.S.C. § 1985(3). Plaintiff respectfully asks the Court to accept this Third Amended Complaint and allow these federal counts to proceed to discovery and trial. Plaintiff seeks the relief set out in the Prayer for Relief and any other just and proper relief.

Respectfully,

/s/ Justin X. Hale

Justin X. Hale
2904 Sprouted Grain
Seguin, TX 78155
(979) 703-0894
November 24, 2024
justinxhale@gmail.com

EXHIBITS

(Exhibit A) Official

CRAA Invite

College 7s championships

Inbox x

N

Nick Ricono

<nricono@usa.rugby>

Sat, Mar 18, 3:10 PM

to Jamie

7s Refs,

You would arrive Friday evening and depart Sunday evening or Monday morning. USA Rugby will cover travel and hotel and provide a stipend.

Please let me know if you are available and I will forward details for travel.

Thanks very much and looking forward to seeing you all soon!

Nick Ricono
USA Rugby 7s Referee Manager

from: Nick Ricono <nricono@usa.rugby>

to:

cc: Jamie McGregor <jmcgregor@usa.rugby>

date: Mar 18, 2023, 3:10 PM

subject: College 7s championships

signed-by: usa-rugby.20210112.gappssmtp.com

security: Standard encryption (TLS) [Learn more](#)

Important according to Google magic.

College 7s championships

Inbox x

N

Nick Ricono

<nricono@usa.rugby>

Sat, Mar 18, 3:10 PM

to Jamie

7s Refs, I'm happy to invite you to referee at this year's College 7s Championships in Houston, TX the weekend of May 6, 2023.

You would arrive Friday evening and depart Sunday evening or Monday morning. USA Rugby will cover travel and hotel and provide a stipend.

Please let me know if you are available and I will forward details for travel.

Thanks very much and looking forward to seeing you all soon!

Nick Ricono
USA Rugby 7s Referee Manager

J

Justin

<justinhale@gmail.com>

Sat, Mar 18, 5:05 PM

to Nick, Jamie

Available. Will drive from Austin.

On Mar 18, 2023, at 3:05 PM, Justin <justinhale@gmail.com> wrote:

You're welcome!

Looking forward to it!

My pleasure.

(Exhibit B) Phone Call Transcript

Jamie McGregor (00:00):

I, I've got a bit of bad news for you. Um, I, I understand. I, I think you were in, uh, you were out on, in the East coast for the CRCs on the weekend. Is that right? Yeah. All right. So I mean, you, I'm assuming that you would know that that means when we, we can't use you for the c r a tournament this weekend, right?

Justin X. Hale (00:21):

Mm, no, didn't, didn't assume that.

Jamie McGregor (00:25):

Okay. Um, so as you would know, cause I mean, I know that you, you followed some of this stuff with NCR, um, you know, you know, that was an NCR tournament that was being played, right? Yep. Yeah. So this is c r a and as you would know, would know from following stuff, you know, that tournament was not sanctioned. It, it, it, um, and, and referees who were part of that tournament can't then be used in the other college stuff based on the agreements that we've got with the different college organizations. So, um, I'm, I'm sorry if that wasn't told to you by, um, the CRCs guys. Um, you're not the first person to have been burned by them by making that clear. They, they definitely know that that's the case. Um, and oftentimes they don't tell referees that that is the case. Um, and, uh, it's very upsetting for us that when they kind of get people along on false pretenses. But, um, that's just kind of the, the, the way that that goes. Um, you would've noticed that none of the other referees, you know, the Ciscos, the cats, the Jacobs, the Alex, you know, there, there were none of the other referees at that tournament. And that's, that's why, um, so, uh, I I, I, this is absolutely shitty and I hate to, uh, be the bear of bad news on that front, but, um, we're, we're just not in a position to be able to use you for the C.R.A.A Champs. Does, does that make sense?

Justin X. Hale (02:00):

No, it don't make sense, but I hear you. I don't, it, it, it's fucking stupid. But I hear what you're saying, so, no, it does not make sense, but I hear you.

Jamie McGregor (02:08):

Yeah. I mean, the whole thing doesn't make sense, um, in the sense that I, I just wish these people could get their together and, and, uh, and, and work their problems out. Um, but

Justin X. Hale (02:21):

As it's, yeah, but it's now, it's not them that's saying I can't do it. It's USA rugby. So, um, that's, that's a, that's a little untruthful on your, on your end, in my opinion. But, um, okay. I, like I said, I, I hear you. I, you're <laugh> it, it, it doesn't matter. It, it, it, it, it doesn't matter cuz it's not gonna change anything.

Jamie McGregor (02:42):

No, it's not gonna change anything. But I, I mean, I do want you to understand where I'm coming from, and I, I don't want you to think that we are being untruthful or unfair from our, our perspective. So, I mean, I'm at your disposal to answer any questions that you've got about why we're in this position or what, what's happening between the two organizations and all that kind of stuff. If you have, if you have any questions, ask me. Uh, cause I'll give you a straight answer.

Justin X. Hale (03:06):

Yeah. Well, my one biggest issue is this has never been put in writing for me as a referee, um, ever. So that, that tells me that this is a, a more disingenuous conversation than, than anything else because nobody, everybody refuses to put what you just said in writing, which is a huge issue. Um,

Jamie McGregor (03:31):

Oh no, it's, it's definitely been put in writing and sent to all the referee societies.

Justin X. Hale (03:35):

Okay. Well, I'm, I'm, it's l i i, I don't believe it may, maybe we've thought we've seen it out to everybody, but the, the, the level of activity I have in my society, and I've never gotten that information. Never. Um,

Jamie McGregor (03:52):

So I'll send you a copy of the document that's gone through the R L C that's been sent to every referee society, including Lone Star, and was sent at the end of last year about the split between NCR and, and, um, uh, and, um, the college council and the, the, what, what are the consequences of referees to referee unsanctioned rugby, um, and what, what, what are, you know, what it all entails. Happy to send that to you.

Justin X. Hale (04:23):

Yes, please. Uh, yeah, please do.

Jamie McGregor (04:29):

Okay. Anything, yeah. Any other, no,

Justin X. Hale (04:32):

It's just, yeah, it's, it's just crap because we're not employees of anybody and we're 10 99 and Yeah. And we can, yeah, it, it doesn't matter. It doesn't matter. I'm not gonna put out my frustration. Um, no.

Jamie McGregor (04:45):

Hey, to be honest, I'm here for you to, to take out your frustration on, right? I'm the person making the call. Feel free to vent your frustration if you want to, or explain what the situation is. I mean, you, you know that there's the, there's the schism between the two organizations, right?

Justin X. Hale (05:00):

Yeah. Yep.

Jamie McGregor (05:02):

Right. And you know that, you know, that other referees are not referring, you know, CRCs or going to CRCs or refereeing that kind

Justin X. Hale (05:08):

Of No, for, for the, the people I talked to that weren't going was specifically cuz they wanted to get their, um, they were doing regional competitions and they, and they really wanted to do those regional competitions. Um, none, none of the, none of the people that, that you listed that I talked to, uh, mentioned it because of that reason. So, um, okay.

Jamie McGregor (05:31):

And no one, no one at CICS told you that?

Justin X. Hale (05:34):

Nope. Nope. And it, what I tell you what, what makes it even more confusing is when you have referee coaches that, that also do both events, right? Uh, and so, uh,

Jamie McGregor (05:47):

For example,

Justin X. Hale (05:49):

Uh, for example, like Terry told me he'll be in, in Houston next week cause he said, can't wait to see you in Houston. Uh,

Jamie McGregor (05:55):

Yes. So Terry is also getting a phone call today. Yeah.

Justin X. Hale (05:59):

So, uh,

Jamie McGregor (06:01):

Terry knows the situation. Terry told us point blank, he didn't care. And so Terry is getting a phone call the same way you are.

Justin X. Hale (06:10):

Okay.

Jamie McGregor (06:10):

So Terry will not be in Houston.

Justin X. Hale (06:13):

Okay.

Jamie McGregor (06:18):

Um, I, I know this is. Um, and it, it just, and if the, the thing that I think is the most frustrating from my point of view is USA Rugby is not in a position to get its side of the story out because it, it doesn't do negotiation and, and, and public information via Facebook post, right? So I get a lot of referees coming to me and saying, Hey, N c I posted this thing on Facebook, you know, they said, oh, we've, we've done this and we've done that. Most of which is untrue. But USA Rugby is not in a position to put out a Facebook post, you know, to try and argue these kind of things. These are all legal matters. They all go through, they all go through lawyers, you know, us Arab is an actual, you know, we're an actual thing.

Jamie McGregor (06:58):

We're a union. We belong to world rugby, we have responsibilities. We, we can't be fighting this kind of stuff via Facebook post, right? And so we get a lot of people saying, oh, well, US Arab doesn't communicate or doesn't tell us this, that, or whatever. And the answer is where we're, we're kind of, um, in a position of fighting what with one hand how it tied behind our back, right? Because we, we can't do the same stuff that NCR is able to do in terms of just, you know, writing stuff, um, and telling people what they, what their side of the, of the picture is. Um, because, you know, as you can imagine, USA rugby can't, can't, can't conduct legal discussions via social media. You know, that's just not the way that it works if you're in, if you're an actual reunion, right? So, um, that, that is the frustrating thing for me because I see a lot of referees saying, well, we're only getting information from one side, or this is what we're being told and this is what, you know, these are, these are the, this is, these are the people that are really trying to grow the game or whatever it might be.

Jamie McGregor (07:56):

And, and there isn't an opportunity for us to get the, um, the other side of the picture out or, or correct some of the misinformation that's that's out there, which is, and that's frustrating for me. And I imagine it'd be frustrating for the referees who, who kind of caught in the middle. Um, I don't know if that makes any sense, but, um, it, it, it, that's, if you've ever got any questions about why this is the

case, what, what is the, how has this come to pass? What is the actual issues that, that, that, that are between the two organizations? I'm happy to give you as much information as I can.

Justin X. Hale (08:25):

Yeah. Well, you know, if it's not information that that can be public, then, then I, I'm probably not privy to the information. So it's, it's, it's, yeah, it's, it's no big deal. Just a man in the middle. So it is what it is. We're

Jamie McGregor (08:39):

All we Yeah. And, and look, I'm not gonna pretend like, you know, I, I've got a job to do. I, I mean, it's the first thing to say, it's not really a USA rugby thing, it's a college council thing, right? Because after the, the bankruptcy college, um, the, the, uh, geographic unions and the CS at youth and high school run run their own organizations. So we, we effectively are here to kind of help facilitate that and support them. Obviously the college council is part of U S USA rugby, that's vol voluntary, and c r is not, um, so, you know, this is, this is c a and so from their perspective, they don't want, which I, I understand, but they don't want at their tournament, people who are supporting, you know, an organization that wants them to basically not exist. And, and, you know, they, you know, <laugh>, NCR sued to stop USA Rugby and, and the college council's existence, right?

Jamie McGregor (09:35):

You know, this is, this is this organization wanted to kill us, basically. And so the, their attitude is, well, anyone that's kind of helping them out or giving them oxygen or, or, or support and assistance, um, you know, that they don't wanna be involved in, you know, they don't wanna have those people involved in their tournaments as well, right? So that's their attitude, which is frustrating for me because, you know, I'm, I come from a place where this is just not an issue. The, the, you know, every, every every game of rugby in Australia are sanctioned is not even, it's not even a question. It's not even a, it's not even a thought bubble, you know? It's just, yes, this is the governing body, this is the, this belongs to world rugby. We wanna be part of rugby. I've never come across an organization that doesn't want to be part of rugby, right?

Jamie McGregor (10:16):

That just wants to do its own. Welcome to the USA, I suppose. But, um, uh, you know, it's, it's, uh, I dunno why the two organizations can't get together and just short sort their out. Um, uh, you know, I know that there are, um, you know, sticking points and it's all got to do with money and, and, and, you know, I I I suspect people's pride on both sides at this particular point, but, um, I wish this was not an issue and I wish I wasn't having to have this conversation to be honest. Yep, I hear you. Yeah. So look, the, the, the number one thing I would say is, um, that from our perspective, this is, and, and the reason I'm having this phone call, and you will certainly not see it like this, and I totally understand that if that's the case, but for me, this is, this is an initial fairness to the referees that, and I know you say you haven't spoken to anyone that hasn't gone, but I can tell you there were a whole bunch of referees

that didn't, that would've liked to have gone to the, to that tournament, but didn't, because it's not sanctioned.

Jamie McGregor (11:16):

And so it's particularly, and I, I, I just feel it's unfair to them if we allow referees, you know, to, to do both without any issue when they went, you know, they did the right thing. They chose not to go to the tournament, they're doing sanctioned rugby only if they are expecting us to, to, to, um, you know, support their development or support with coaching or fund for their attendance or whatever, whatever else it might be, to, to different events. So where U s A rugby is trying to support or run or assign people to various different events and things, then, you know, we, um, uh, you know, that then we, we are gonna support the people who support us. It's basically,

Justin X. Hale (11:55):

Yeah, but well, you're gonna, you're gonna have support the people that support you because at the end of the day, at, at the end of the day, I pay dues to both society. I, I, I held all my, all my games. Most of 90% of my games I've had this year are NCR games because the, uh, I don't get enough club rugby games with within my society. So, um, you know,

Jamie McGregor (12:20):

So we have, what we've said is, what we've said is around NCR matches. Like, so for example, um, things like what we have said is we are not going to go hunting. Like I'm, I'm not gonna go looking into everyone's, um, uh, you know, especially for some people in the Northeast. We are not going to a one off NCR game here or there, or college or whatever it is that that's one thing. But you know, for the people that turn up at national championships and are on television and supporting NCR in that sense, like, it, it just puts us in a very difficult position. We can kind of try and be as reasonable as possible to people who are in an area where they, um, you know, so I I'm still a, we we would've appointed you, um, you know, even though maybe you've been doing some NCR matches appointed by Lone Star or what, whatever it might be. I mean, we should launch,

Justin X. Hale (13:17):

Which, which is my society, um, yeah. <laugh> within

Jamie McGregor (13:19):

Your society. Yeah, we should probably not, but we would've done it anyway. But there's just a, a difference between that and, you know, running out on tv supporting their national championships, right? And the same has been true of referees who have gone, cuz they've, he held like their, you know, their fifteens national championships in Houston previously. So there's been a couple of referees that have, that have, that have done that have done that. And we've had to say, look, I'm sorry, we can't use you for the next event. Um, you know, you and, and a lot of them, you know, I mean, I think have been, you know, look, I don't want to cast dispersions, but, but you know, NCI knows exactly what

the situation is and they, they know that referees that they, I mean, why do you think they went to Canada, right?

Jamie McGregor (14:04):

They've went to Canada to ask a bunch of referees to attend because they couldn't get enough referees here because people are not willing to put themselves at risk of doing unsanctioned rugby, right? Because we just don't know, you know, if there's an, if, if a neck gets broken right in one of those matches, you know, you have no backing from us. You have no backing from world Rugby, you have no backing from anyone. Now NCR says, oh, we have insurance, but that hasn't been tested. You know, because what qualifications do you have? NCR doesn't run any qualifications. They don't have any, um, they don't have, they don't run courses. They don't check that people have got background screening and safe sport and, and, and do all of their stuff. They don't do any of that. They don't require any of their coaches. They don't, they have minimum requirements of the coaches, which currently they require something from USA Rugby to actually, um, and, and it's not even the full amount of what is compliant.

Jamie McGregor (14:58):

So, you know, there's, there's a lot of questions that are yet to be answered. Um, God forbid every anything ever happened to anyone. Um, but anyway, there's, there's a lot of people that are in a position where they are not told what the exact risks are going in. And this is, this is a problem, right? Um, and, uh, I, I'll forward you the document that we've sent to all theros and all the referee societies and, um, it, it was also put on social media I believe as well. So, um, I'll, I'll send it to you. You can have a read of it if you haven't been sent, you should ask Lone star wh why they haven't made sure that all of their referees have it. Um, and have a copy of it if you, if you want. Um, but that's, that at least, we'll, we'll show you what it, what was put down in writing a, a year or so ago.

Justin X. Hale (15:49):

Okay,

Jamie McGregor (15:51):

Man, I'm sorry, I don't like to have this conversation and I, I, you know, I apologize for being the bearer bad news from that front, but, um, uh, it is what it is. And until the two organizations, the college council and nci, I can sort their out. This is just the reality for us, which is if we're gonna be spending money or we're gonna be supporting people or whatever, you know, if we're gonna put money into people's development, we need to know that they're, they're supporting that organization. So, um, I don't think this is a, by the way, I, I don't think this is a lone star or a T thing. I think it's, it's, you know, Lonestar in good standing with USA Rugby, right? It's a, it's, it's, it's a, this, this is not a lone star T thing. It's a, it's a NCR um, uh, college council thing. So C

Justin X. Hale (16:38):

No, but the, the, the reason I say it's a problem if 90% of my games are, are NCR games during the year, um,

Jamie McGregor (16:48):

It,

Justin X. Hale (16:50):

It's not, it's not like I'm getting USA appointments week, weekend and, and, and week out. So when we talk about development development, it isn't just webinars and coming to courses actually getting a chance to, to referee and, and do high profile matches and, and, and do those type of games. So, um, yeah, so

Jamie McGregor (17:08):

Yeah, well, I mean, we, we, we would've wanted you in Houston, you know? Um, now, I don't know, maybe c honestly, maybe CRCs was a better experience. I don't know. Maybe Houston will be a complete show for CW c a quite frankly, I have my issues with both of those organizations and the way they run <laugh>, they, they way they run their, their stuff. So maybe you got the better of the deal and, and there'll be, and it will have been a better, um, a better tournament for you. So I mean, if, and, and maybe, maybe you get better games out of that, that tournament than you would in this tournament. I, I, I judge, I just dunno. Um, all, all, I, uh, but I, but I do, I do take your point that, um, you know, the, the issue is not just access to information, it's also access to being assigned to stuff.

Jamie McGregor (17:52):

And you know, Nick, Nick likes you as a referee. We want you to be part of stuff. That's why we selected you in the first place. You know, we, we, we want, we want to put time, effort, and development into you. You know, we, we've invited stuff in the past. We, we want to, we want to do that. Um, this is just a situation where, you know, we, we are, we are stuck between a rock and a hard place because N C R last year got their tournament sanctioned. They paid, they, they got sanctioned this year. They said, you we're not doing it. So, okay, fine, but that's, that, that's a situation we're in now, <affirmative>.

Jamie McGregor (18:27):

But, and, and by the way, in case you think, you know, cause I take, I totally take your point about fairness in terms of the referee coaches. So that is, you know, that is something that we have to be consistent on. The same is true of Canada. So Canada is, uh, already going through a process of sanctioning for the referees that left because can Canadian rugby sent all of the referees from Quebec a letter saying that they should not be attending the tournament. And in particular, Michel Nicoletti who was involved with, with refereeing the final, he did not tell the Canadian refer, uh, referee manager that he was going. And, um, and, and they're, they're, they're in some, they're, they're in some strife as well. So this is the, the different, this is not just us being, you know, about the whole thing, although I

can understand entirely how that might be the, how might be perceived that way at this particular point. It's a, it's a serious issue that, well, rugby has to deal with because we can't have unsanctioned rugby, basically. That's the way rugby union works. Um, you know, so anyway, if you've got any, I I don't understand there's a pain, but if you've got any questions about anything, feel free to ask me. I will email you the, the, the document now.

Justin X. Hale (19:41):

Okay. Thanks Jamie.

Jamie McGregor (19:43):

All right, I'll catch you later. Thanks Justin. Cheers. Bye. Bye.

(Exhibit C) Email to David Wilkinson, MLR

Inquiry Regarding Referee Appointments in MLR



➤ Inbox x



Justin <justinhale@gmail.com>
to dwilkinson ▾

Fri, Mar 15, 12:50 PM



Good morning David,

I hope this email finds you well. My name is Justin X. Hale, and I serve as a referee based out of Austin, TX. I am reaching out to seek some clarity regarding my current status within the MLR referee appointments.

In the previous season, I had the privilege of serving as an Assistant Referee in the MLR, accumulating approximately nine appointments in this role. I am proud to mention that I was recognized as a top AR in Texas for MLR, earning an invitation to the referee's mid-season camp—a testament to my dedication and performance.

Since concluding my last match in the MLR, I have diligently maintained both my physical and mental readiness for the game. In 2023 alone, I officiated over 200 matches, serving as the Center referee or AR. Over 40% of those games involved XV matches. Moreover, I have received positive feedback from the previous referee manager (JK) and Austin Reed, who oversaw the West ARs.

Approximately a month ago, I was pleased to receive a teamwork contact from MLR "USA Referee Starter Pack 2024". However, since then, I have not received any further communication. Regrettably, I have not been invited to any meetings, received appointments, or been provided with any explanation as to why I am not currently involved in the refereeing assignments.

I understand that my tone may come across as blunt, but I am simply seeking clarification as no one from the administrative side of the organization has communicated with me.

I would greatly appreciate it if you could provide me with some insight into my current situation and any steps I can take moving forward.

Thank you for your time and attention to this matter, I am happy to talk on the phone, text, or email

--

Cheers,

Justin X. Hale
(979) 703-0894 - Text Welcomed



David Wilkinson <dwilkinson@usmlr.com>

Fri, Mar 15, 1:20 PM



to me ▾

Hi Justin,

Thank you for getting in touch.

Unfortunately I am currently not in a position to appoint you as an AR to MLR .

Can I suggest you reach out and speak to Jamie McGregor. With my role being across both USA Rugby and MLR I am afraid my hands are tied.

If and when this issue gets resolved, I would be happy to look at your involvement in MLR.

But as things stand I cannot appoint you.

Regards



David Wilkinson, Major League Rugby Director of Match Officials

+44.779.906.2813 | dwilkinson@usmlr.com | usmlr.com



...



Justin <justinxhale@gmail.com>

Fri, Mar 15, 2:32 PM



to David ▾

Thank you for the transparency David and the speedy response. I'll work on figuring out what issue is going on. Interesting enough this past New Year's I did a 2day AR presentation for USA rugby.

Hope to meet soon.

Cheers,

Justin X. Hale

(979) 703-0894- text welcomed

...



David Wilkinson <dwilkinson@usmlr.com>

Fri, Mar 15, 2:57 PM



to me ▾

No problem Justin.

Apologies.

Speak to Jamie and hopefully you can get it sorted and get back in MLR.

Wilko



David Wilkinson, Major League Rugby Director of Match Officials

+44.779.906.2813 | dwilkinson@usmlr.com | usmlr.com



**(Exhibit D) Email to
Nick Ricono and
Phone call log**



Justin <justinxhale@gmail.com>

7s season

Justin <justinxhale@gmail.com>
To: Nick Ricono <nricono@usa.rugby>
Bcc: marquiseagoodwin@gmail.com

Fri, Jun 28, 2024 at 3:59 PM

Hi Nick,

I hope all is well. I heard that invites for Club 7s went out yesterday. Initially, I thought this email might be our invitation back to nationals. I wanted to confirm if I was not invited, and if so, could you please let me know why? Is there something I need to show or do still? I also have footage of me refereeing the USA 7s vs Japan 7s National teams from this past week too if you need to see more recent film than bloodfest 7s.

Thank you,

Justin X. Hale
(979) 703-0894 - text welcomed

Cheers,


Justin X. Hale
(979) 703-0894- text welcomed

On Mon, May 13, 2024, 3:05PM Nick Ricono <nricono@usa.rugby> wrote:

Hi refs, we had a great kickoff for Women's College 7s last weekend. Unfortunately Men's College 7s was cancelled due to teams opting out at the last minute. PR7s was pushed to October. So our next national event will be Club 7s on August 10 weekend again in Madison. Before that we'll be cheering on Kat and Cisco in the Olympics!

Stay active this summer in your regional comps and qualifiers. Let me know if you need any contacts.

Here is a link to video review form for 2024.

 [AHkbwyJHw7M1nXLwDOVs5yeVy6jTbWwEuAjqjTqk8V9xOAZ1gdSeELOrB4EwJeqKtH5BoyGYbAp=w1200-h630-p.png](https://docs.google.com/document/d/15Db9Wj0_B4EwJeqKtH5BoyGYbAAHkbwyJHw7M1nXLwDOVs5yeVy6jTbWwEuAjqjTqk8V9xOAZ1gdSeELOrB4EwJeqKtH5BoyGYbAp=w1200-h630-p.png/edit)

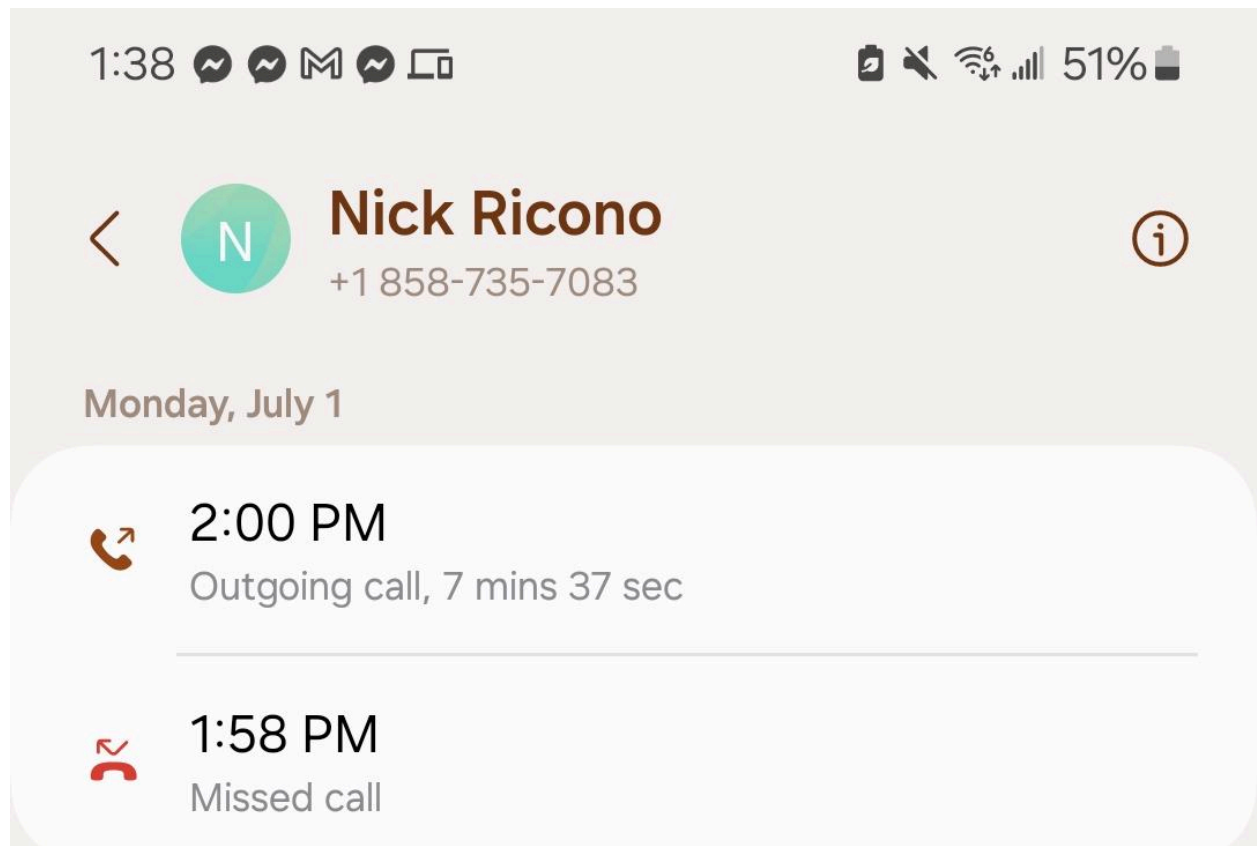
2024 7s Match Reviews
docs.google.com

Send links or clips if you have any questions or things you'd like to discuss. I'll put a whats app group together.

Thanks all!
Nick Ricono



AHkbwyJHw7M1nXDi1GxYW-wDOVs5yeVy6jTbWwEuAjqjTqk8V9xO
AZ1gdSeELOnT3BgGQlc1mdere0zed3Us_sQGgNd-I5Db9Wj0_
B4EwJeqKtH5BoyGYbAp=w1200-h630-p.png
188K



(Exhibit E) Email

Inviting to Regionals



Justin <justinhale@gmail.com>

Rugby rugby rugby!

5 messages

Randall Johnson <randall.johnson@gmail.com>
To: "JustinXHale@gmail.com" <JustinXHale@gmail.com>

Tue, Mar 21, 2023 at 6:37 PM

Justin,

Randall here. Hopefully you remember me!
Whatcha doing May 6/7?

Justin <justinhale@gmail.com>
To: Randall Johnson <randall.johnson@gmail.com>

Tue, Mar 21, 2023 at 10:28 PM

CRAA 7s Championships in Houston. What's up?
[Quoted text hidden]

Randall Johnson <randall.johnson@gmail.com>
To: Justin <justinhale@gmail.com>

Wed, Mar 22, 2023 at 4:10 AM

Was going to offer you Club Regionals in Orlando.
[Quoted text hidden]

Justin <justinhale@gmail.com>
To: Randall Johnson <randall.johnson@gmail.com>

Wed, Mar 22, 2023 at 7:52 AM

Awww man! I've already confirmed with Nick Ricono. I do appreciate the opportunity though.
[Quoted text hidden]

Randall Johnson <randall.johnson@gmail.com>
To: Justin <justinhale@gmail.com>

Wed, Mar 22, 2023 at 8:49 AM

No worries!
I'll see you soon somewhere!
[Quoted text hidden]

**(Exhibit F) - Matt
Lakes Remarks on
USA Rugby, Chair of
USA Rugby DWG**

Matt Lake's Post



Matt Lake

May 12, 2023 · 🌐



A Personal Statement on the Current State of Collegiate Rugby Refereeing

Referees are used to being placed in between two opposing sides- that's literally our job. We are at our best when we facilitate a fair contest and don't allow ourselves to become the focus. Anyone who has refereed knows this isn't an easy thing to do, and it's made even more difficult when teams focus more on the referee than on their own actions.

In many ways, this is what's happening in the disagreement between USA Rugby/CRAA and NCR. By now, many people are aware of the ongoing dispute and, to some extent, know the basic details. What most people don't realize is how both sides are using referees as pawns to further their goals. Beginning this past week, representatives of USA Rugby and CRAA informed a number of referees that they had been formally barred from officiating in certain competitions as a result of their participation in the Collegiate Rugby Championship 7s event organized by NCR. Others were told, in no uncertain terms, that should they officiate national NCR events, they would no longer be considered for appointment to any USA Rugby-organized event, not just those organized by CRAA. In short, referees are being told to pick a side should they wish to continue their careers.

Referees don't pick sides, nor should they ever be put in that position.

I serve as president of the Upstate NY Rugby Referees, am a co-founder and executive administrator for the Atlantic North Coalition of Rugby Referees (a coalition of referee societies that cover upstate NY, Metro NY, and all of New England), and act as the Eastern representative for USA Rugby's National/Regional Development Group. I've also been fortunate enough to officiate at almost every national NCR event over the last 2+ years and have regularly refereed in CRAA-organized competitions and USA Rugby regional playoffs.

In short, I'm in a unique position to understand both USA Rugby's/CRAA's and NCR's positions, and have had multiple opportunities to hear both of their stances in person.

Both sides have shown an inability to put rugby first, and both have chosen to allow this conflict to fester for over three years without resolution. As a result, at least two referees and one referee

Both sides have shown an inability to put rugby first, and both have chosen to allow this conflict to fester for over three years without resolution. As a result, at least two referees and one referee coach were pulled from last weekend's CRAA Championships after having officiated at NCR's Collegiate Rugby Championships the previous weekend. Other referees have been called by USA Rugby with a general warning that further participation in NCR national events may disqualify them from any CRAA or USA Rugby assignments.

Although USA Rugby and CRAA have made vague intimations over the last few years that assignments might be pulled if a referee participated in NCR events, participation in this year's CRCs carried actual consequences. The removal of match officials from the CRAA Championship Weekend represents a significant escalation, and any hypothetical consequence in the past has now become real.

Putting aside the fact that those officials made a choice despite knowing the possible consequences, the real issue is that it is unacceptable for referees to be put in that situation to begin with.

Both sides have valid enough reasoning for their stances, at least in the abstract. I have no interest in outlining these stances as I don't represent either side and do not want to be accused of misrepresenting any organization.

At the same time, both sides have also engaged in practices that are disappointing, at least in my opinion.

USA Rugby and CRAA putting referees in a position to choose sides between organizations isn't acceptable, and pulling assignments or making them ineligible for certain events is even worse. Referees should not be used as leverage or pawns in a fight that has nothing to do with us.

The rhetoric coming from NCR isn't any better. Pushing an anti-USA Rugby agenda through emotional and ill-considered outbursts on social media and an inability to move forward instead of holding on to past grievances only hurts their cause. NCR leadership has made this personal, and as a result their position is becoming more intractable and their conduct less defensible.

Having this issue drag on for three years doesn't help anybody and the apparent lack of urgency is no longer tenable. The looming threat against referees has been an open secret in the referee community for years. Making both sides' actions public is one of the few ways we have to advocate for ourselves as referees, as we do not have any kind of formal representation at the negotiating table.

None of this is personal, nor has it ever been- at least to me. I have been granted numerous opportunities by administrators from USA Rugby, CRAA, and NCR. I certainly hold no ill will towards any individual involved and I am forever grateful to so many people who have helped me along the way, many of whom represent CRAA, USA Rugby, and NCR.

If my speaking up means those opportunities will no longer be afforded to me, so be it. The needs of all referees outweigh my own aspirations. There is a real and understandable fear of consequence within pockets of the referee community for publicly weighing in on this matter. I do not pretend to speak on behalf of all referees, but I know there are a number of great referees who share my sentiment and disappointment as it personally affects them, and others share my sentiment on general principle.

When teams put pressure on us in a game, referees are taught to put the pressure back on the captains to improve behavior. This is my attempt to put pressure back on CRAA, USA Rugby, and NCR leadership to lead. My sincere hope is this brings both sides back to the table to engage in a good faith effort to find an equitable agreement. Both sides have great people who understand that a resolution is ultimately what's best for rugby in the United States.

I simply want to make it clear that referees should only be placed in the middle while on the pitch, not off it. I hope that others in the rugby community agree and are willing to publicly support us.

-Matt Lake



You, Akira Do, Tom Ciampa and 243 others

62 comments 63 shares

(Exhibit G) - Matt

Lakes International

Test Match Contact,

Chair of USA Rugby

DWG



Matt Lake

April 30 · 🧑



When I started reffing, I never thought this would be a possibility. But this Saturday I have the honor of refereeing an international test match between Bermuda and the Cayman Islands. There are so many people that helped me get here and I can't possibly name them all, but I'll be carrying you in my heart as I pull on a World Rugby jersey for the first time.



You, Marquise Goodwin, Akira Do and 253 others

56 comments

Like

Comment



Matt Lake

May 3 · 🧑🏻‍🤝‍🧑🏻

In case you want to watch my match, here's the livestream link for Bermuda v Cayman Islands, tomorrow at 4pm Eastern:

<https://www.youtube.com/live/wHf-mmhg5gs?feature=shared>



**(Exhibit H) - Matt
Lakes appointed to
Chair of USA Rugby
DWG**

New DWG Chair, RDG Meetings Survey ➤



USA Rugby Referee Development <referee-development@usa.rugby>
to Dave, Kahili, Brian, Matt, bcc: me ▾

Wed, Jun 26, 12:00 PM ☆ ☺ ⏮ ⋮

Hello all

I saw most of you last night in your last RDG meeting - **congratulations** on another year! **Thank you** for making my tenure as the Developing Working Group (DWG) Chair so fulfilling!

As announced last night, **Matt Lake** will be presented to the RLC for (expected) ratification as the new DWG Chair.

Help next year's DWG raise the bar on the usefulness of your monthly RDG meetings by filling out this [brief survey](#).

The data is useful, and it's important to hear what works well, but what's invaluable are your clarifying comments - these help us find **actionable items to improve the content and experience**. If there is anything you don't like about these meetings, this is your chance to say it with effect.

This survey is **anonymous**. I'll be presenting the aggregated data and comments back to the group, not the individual responses.

Feel free to reach out to me or your regional rep with questions.

Best regards,



Rosalind Anderson
Referee Development Coordinator

+1 646.325.3147 | 501 S Cherry St Unit 100 Glendale CO 80246 | referee-development@usa.rugby



(Exhibit I) - Amelia

Luciano Refereeing


NCR Playoff

Tournament for CRC


April 6, 2024


YouTube


new england free jacks rugby


The New England Free Jacks
1.65K subscribers


Subscribe


26



Share

Download

Clip



5,315 views Streamed live on Apr 6, 2024

(Exhibit J) - Amelia

**Luciano contracted to
referee MLR April 20,
2024**

Sunday, April 14, 2024		Assistant Referee 2:Andrew Dunn TMO: Derek Summers
San Diego Legion v. NOLA Gold Snapdragon Stadium, San Diego Sunday, April 14, 2024		Referee: Cisco Lopez Assistant Referee 1: Kate Roche Assistant Referee 2: Fernando Garcia TMO: Greg Gilliam
RFC Los Angeles v. Seattle Seawolves Dignity Health Sports Park, Carson Sunday, April 14, 2024		Referee: George Myers Assistant Referee 1: Marquise Goodwin Assistant Referee 2: Will Nelson TMO: Cam Russell
Week 8		
New England Free Jacks v. Seattle Seawolves Veterans Stadium, Quincy Saturday, April 20, 2024		Referee: Luke Rogan Assistant Referee 1: Amelia Luciano Assistant Referee 2: Aaron Davis TMO: Mike Kelly
Week 11		
Anthem Rugby Carolina v. Houston SaberCats American Legion Memorial Stadium, Charlotte Friday, May 10, 2024		Referee: Amelia Luciano Assistant Referee 1: Eanna O'Dowd Assistant Referee 2: Cam Russell TMO: Derek Summers

(Exhibit K) 2023

Referees at CRCs

2023 College Rugby Championship



Referee Packet

29	Luis Santiago Laino Garcia	Minchul Cho	Springhill
30	Marc Nelson	Amanda Cox	Springhill

Referee Team Contacts

Two What's App chat rooms will be set up and an invite sent to you to join. The first will be for important communication to/from the referee team. The second will be for fun where we can post pictures of your favorite referee in action or other interesting pictures/chats.

The Referee Team contacts are as follows

Role	Name	Email	Society	Phone
Referee	Abigail M. Tobias	abby.marie.tobias@gmail.com	Potomac	703-963-9829
Referee	Adam Falk	adammfalk@gmail.com	Iowa	515-664-7515
Referee	Akira Do	mrakira400@gmail.com	NE	617-870-1770
Referee	Alana Gregory	gregory.alana1@gmail.com	NYSRRS	607-727-3930
Referee	Alec Montealegre	montealegre0@gmail.com	Quebec	438-885-1569
Referee	Alex Hedquist	hedquist.a@gmail.com	SERRS	803-200-2677
Referee	Alexis Sari	alexissaari@gmail.com	Minnesota	612-990-3205
Referee	Andrew Dunn	andrewjtdunn@gmail.com	Met NY	607-280-9264
Referee	Andrew Futerman	andrew.futerman@gmail.com	CARFU	973-534-8706
Referee	Anthony Helmandollar	helmandollaa@gmail.com	Met NY	571-255-9302
Referee	Aubrey Shultz	aubreygshultz@gmail.com	Potomac	202-468-7790
Referee	Benjamin Cueni	benjaminscueni@gmail.com	Potomac	571-317-5395
Referee	Benjamin Michael Dickenson	bdickenson6709@gmail.com	Midsouth	615-653-6026

Referee	Christopher Chopra Micheletti	c.c.micheletti@outlook.com	Quebec	514-777-1535
Referee	Cody Kuxmann	ckuxmann@gmail.com	EPRU	717-810-9709
Referee	Chris Gower	cblaiseg.gower@gmail.com	Midsouth	615-425-6584
Referee	Daniel O'Shea	danny.j.oshea@gmail.com	Quebec	514-709-1710
Referee	Danielle Dawn McKenzie	dawnmckenzie01@gmail.com	CARFU	312-505-5508
Referee	Donald J Taylor	dtaylor1987@gmail.com	CARFU	217-493-4500
Referee	Eduardo Tapia	Tapia.eddy92@gmail.com	Iowa	515-217-7174
Referee	Elizabeth Forro	lizforro@gmail.com	Potomac	610-608-8915
Referee	Emma Gallagher	ekrgallagher96@gmail.com	Quebec	438-880-1996
Referee	Gary W Porter Jr	garypj1976@gmail.com	TRRA	580-280-5750
Referee	George Ryan Caldwell	g.ryan.caldwell@gmail.com	Potomac	832-483-0395
Referee	Guillaume BOISSEAU	guillaume.boisseau@live.fr	Quebec	613-710-6327
Referee	Iose Tafaioalii	iosewest@yahoo.com	Utah	801-688-5845
Referee	Jacob Anthony Cuevas	jakecuevas99@gmail.com	Utah	929-289-2413
Referee	Jacob Winkler	trappedinink@gmail.com	Wisconsin	920-342-7675
Referee	James Acker	jndacker@gmail.com	Quebec	514-895-7688
Referee	Jeff Brill	moose4421@gmail.com	Virginia	515-710-2682
Referee	Jeffrey Andrew McHenry	mchenrycarpentey009@gmail.com	Iowa	239-822-0997
Referee	J��rome L��vesque	levesque.jerome@hotmail.com	Quebec	581-997-1797
Referee	John Francis Patrick Bridges	healththeconomics@icoud.com	Ohio	614-271-5010
Referee	Justin John Savoy-Davies	justindavies17@gmail.com	Quebec	514-887-0121
Referee	Justin X Hale	justinxhale@gmail.com	Lonestar	979-703-0894
Referee	Kiki Malomo-Paris	kmalomoparis@gmail.com	Potomac	703-677-4348
Referee	Kitona FAAMAUSILI	kitonaaulelio@icloud.com	Utah	801-516-8857
Referee	Kyle Kenny	kyle.kenny3@gmail.com	Southwest	925 789 7140
Referee	Kyle van Deventer	kylevd6@gmail.com	Florida	239-370-0477
Referee	Lizbeth Pagan	lizbeth.pagan92@gmail.com	SERRS	704-369-6355
Referee	Luis Santiago Laino Garcia	luis.lainog@gmail.com	Columbia	573012679065
Referee	Matthew Duncan	mattvduncan@gmail.com	Indiana	317-554-7370
Referee	Maxwell Jones	mljonesqwe@gmail.com	Ohio	502-619-1142
Referee	Megan Lowery	megan.lowry@hotmail.com	Quebec	
Referee	Michael David Rudzinsky	michael.rudzinsky@gmail.com	NE	617-240-1585
Referee	Michael Lawrenson	drmikellawrenson@gmail.com	Rocky Mtn	484-264-7370
Referee	Michael Vermaak (Chase)	mvchase98@gmail.com	SERRS	404-268-4225
Referee	Millicent Tysinger	tysingerpmp@gmail.com	SERRS	978-846-4851
Referee	Minchul Cho	minchul.cho@gmail.com	SERRS	404-663-8351
Referee	Nathaniel Jacob Lewin	nathaniel.j.lewin@gmail.com	Minnesota	914-260-5135

Referee	Pete Chamberlin	petechamberlain@gmail.com	SERRS	678-488-4847
Referee	Rachael McGrail	rachaelmcgrail@gmail.com	Ohio	330-307-3784
Referee	Randall W Johnson	randall.johnson@gmail.com	Florida	585-704-1605
Referee	Skye Leary	sleary@dealertire.com	Ohio	440-668-8948
Referee	Soloa Velovaa	solve2771@gmail.com	Utah	801-300-0317
Referee	Tara Roberts	bulb007tr@gmail.com	NE	207-459-4151
Referee	Thomas Ciampa	thomas.ciampa@gmail.com	Florida	207-752-2173
Referee	Timothy Adam Levitsky	tlevitsk@gmail.com	Ohio	216-513-2442
Referee	Tom Foley	foleyt15@gmail.com	Michigan	
Referee	Tyler Vance Crawley	tyler.v.crawley@gmail.com	Quebec	514-820-0248
Referee	Valerie Berstene	vberstene@gmail.com	CARFU	860-604-8355
Referee	Vincent Chweya Maranga	vincent.chweya2015@gmail.com	Virginia	757-996-1940
Referee	Chris Gower	cblaise.gower@gmail.com	Midsouth	615-425-6584
Referee	Jordan Porotesano	jporotesano503@gmail.com	NWRRS	503-544-0318
Referee	Alex Schaefer	ref.alex.schaefer@gmail.com	Potomac	814-460-8929
Referee	Sybil Levine	levine.sybil@gmail.com	MidSouth	615-485-6757
Captain	Josh Houston	joshhous@gmail.com	CARFU	631-678-7863
Captain	Nigel Platt	serrsf@gmail.com	SERRS	864-477-9652
Captain	Robert Gilmore	gilmorer@optonline.net	RRSNY	914-924-3790
Captain	Steve Isreal	izzy_woz@hotmail.com	Potomac	703-727-9172
Captain	William Calum Pender	wcpender@yahoo.co.uk	MidWest	417-766-9795
Coach	Brad Kleiner	bkleiner@yahoo.com	Met NY	917-699-8295
Coach	Jerry McLemore	mclemorejl@toa.com	MidSouth	615-604-0770
Coach	Peter Simpson	pdsimpson@verizon.net	RRSNY	201-390-0436
Coach	Scott Duvall	sduvalbonita@gmail.com	Florida	239-404-8082
Coach	Terry Haas	thaas11@gmail.com	Florida	609-519-4183
Logistics	Alley Mitchell	alley@alleymitchell.com	SERRS	253-358-5499
Logistics	Curtis Ethridge	ctethridge31@gmail.com	SERRS	336-340-6750
Logistics	Erin McCroskey	Erinmccroskey@gmail.com	Midsouth	865-850-8314
Redhat Ref	Steve Parrill	sparrill@usa.rugby	Deep South	985-974-1134
Director	Dave Haines	dhaines@msn.com	MidSouth	865-740-6674
Referee MGR	Dave Carter	dave@rockriverservice.com	CARFU	815-222-3480
Stats	Reagan Douglas	reagan.douglas9@gmail.com	Potomac	703-801-9049
TZM	Andy Buck	andrew.buck2@gmail.com	RRSNY	917-974-0140
TZM	Buzz McClain	rugbybuzz@gmail.com	Potomac	703-727-0230
TZM	Charlie Liu Guillotin	charleshmaries@gmail.com	RRSNY	347-807-4445
TZM	Chris Picard	rugby-referee@sbglobal.net	Met NY	860-670-0625

TZM	Corey Amundson	amundson.corey@gmail.com	RRSNY	(203) 561 7985
TZM	Jessica Mallindine	Jessicamallindine@gmail.com	SERRS	828-545-4439
TZM	Jon Morgan	jmorgan6@gmail.com	RRSNY	631-678-7863
TZM	Karen Espinoza	klespinoza722@gmail.com	Potomac	301-437-0319
TZM	Ken Fraine	kenfraine@gmail.com	Potomac	(703) 725 3896
TZM	Lillianna R. Rimac	lillyrimac22@gmail.com	RRSNY	973-229-4135
TZM	Nathan S Brady	nathansbrady20@gmail.com	Potomac	410-458-5068
TZM	Patrick Laczkowski	patlacaz@gmail.com	NYSRRS	716-860-1558
TZM	Sarah Seeger	SDSEEG@gmail.com	MARRS	573-808-6952
TZM	Tom Beriau	tomberiau@gmail.com	NE	617-875-6515

Arrival Pick-Up

Please see below the schedule for pick-ups from the three airports. We are requesting that everyone meet outside baggage claim on the lower level at the following airports:

BWI – Outside of carousel 3
IAD – Outside at Door Number 4
DCA – Outside on median across from area 6

Please stand outside at the pick-up time listed and the 12-passenger van will meet you there to transport you to the hotel.

Uber pick-up on the schedule will be reimbursed by NCR.

(Exhibit L) - MLR

2024 Match

Appointments



Match Official Appointments

Match Officials for Major League Rugby are appointed from USA Rugby, Rugby Canada, and selected International referees. The MLR Referee group consists of 12 US and Canadian referees and 4 International referees. For each match, four officials (1 referee, 2 assistant referees, and a TMO) are selected by the MLR management team of David Wilkinson, Alain Rolland, and Dave McHugh.

Week 1	
NOLA Gold v. New England Free Jacks The Gold Mine, Metairie Saturday, March 2, 2024	Referee: Luke Rogan Assistant Referee 1: Ian Seaton Assistant Referee 2: Allen Alongi TMO: Derek Summers
Houston SaberCats v. Utah Warriors SaberCats Stadium, Houston Saturday, March 2, 2024	Referee: Robin Kaluzniak Assistant Referee 1: Pete Pender Assistant Referee 2: Blair McClure TMO: Saro Turner
Seattle Seawolves v. San Diego Legion Starfire Stadium, Tukwila Saturday, March 2, 2024	Referee: Federico Anselmi Assistant Referee 1: Chris Assmus Assistant Referee 2: Brad Schwalger TMO: Austin Reed
Miami Sharks v. Chicago Hounds AutoNation Sports Field, Fort Lauderdale Sunday, March 3, 2024	Referee: Kahlil Harrison Assistant Referee 1: Miles McIvor Assistant Referee 2: Tom Ciampa TMO: Amanda Cox
Anthem Rugby Carolina v. New England Free Jacks American Legion Memorial Stadium Sunday, March 3, 2024	Referee: Marquiese Goodwin Assistant Referee 1: Luke Rogan Assistant Referee 2: Mike Lawrenson TMO: Austin Reed
RFC Los Angeles v. Dallas Jackals Dignity Health Sports Park, Carson Sunday, March 3, 2024	Referee: Scott Green Assistant Referee 1: Kat Roche Assistant Referee 2: Will Nelson TMO: Saro Turner

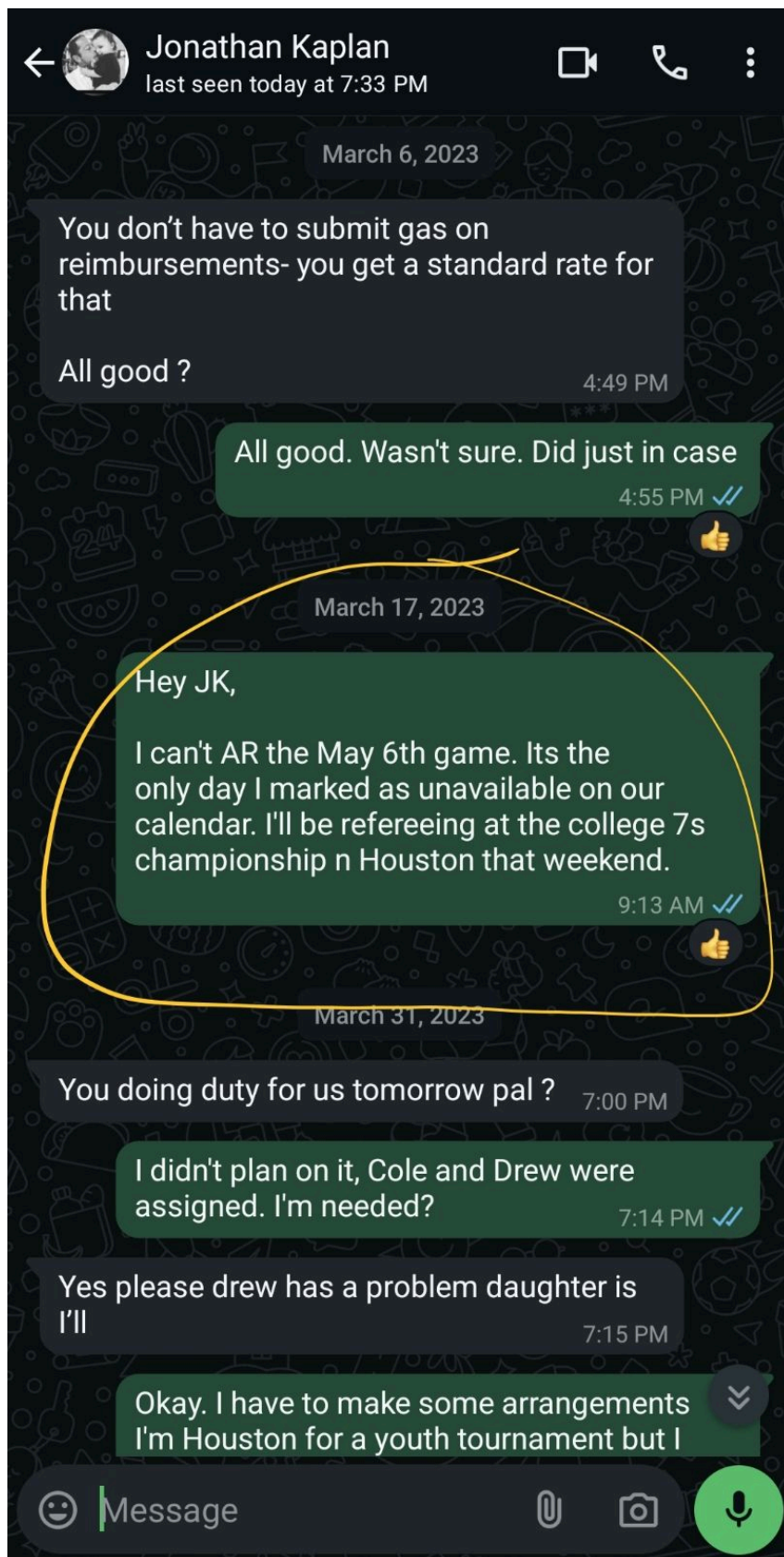
Week 3

New England Free Jacks v. NOLA Gold Veterans Stadium, Quincy Saturday, March 16, 2024	Referee: Cisco Lopez Assistant Referee 1: Miles McIvor Assistant Referee 2: Jarrod Ford TMO: Chris Assmus
Old Glory DC v. Chicago Hounds Maryland Soccerplex, Germantown Saturday, March 16, 2024	Referee: Federico Anselmi Assistant Referee 1: Pete Pender Assistant Referee 2: Aaron Davis TMO: Austin Reed
Houston SaberCats v. Miami Sharks SaberCats Stadium, Houston Saturday, March 16, 2024	Referee: Lex Weiner Assistant Referee 1: Scott Green Assistant Referee 2: Jono Cooper TMO: Eanna O'Dowd
Utah Warriors v. Seattle Seawolves Utah Warriors, Herriman Saturday, March 16, 2024	Referee: Luke Rogan Assistant Referee 1: Kahlil Harrison Assistant Referee 2: Kage Green TMO: Amanda Cox
San Diego Legion v. RFC Los Angeles Snapdragon Stadium, San Diego Saturday, March 16, 2024	Referee: Robin Kaluzniak Assistant Referee 1: Derek Summers Assistant Referee 2: Alexis Alfaro TMO: Chris Assmus
Anthem Rugby Carolina v. Dallas Jackals American Legion Memorial Stadium Sunday, March 17, 2024	Referee: Moe Chaudry Assistant Referee 1: Amelia Luciano Assistant Referee 2: Alex Hedquist TMO: Greg Gilliam

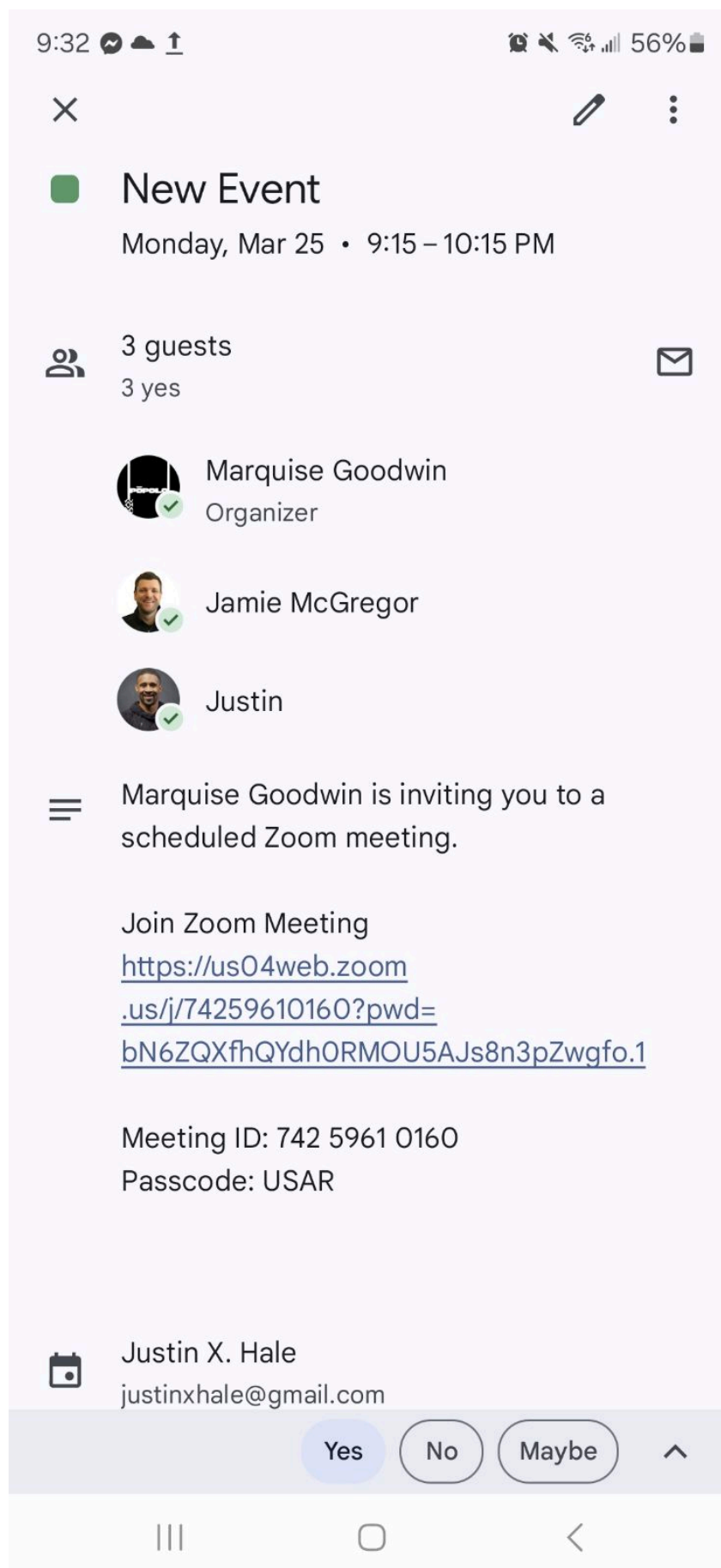
Week 4

Seattle Seawolves v. Houston SaberCats Starfire Stadium, Seattle Friday, March 22, 2024	Referee: Moe Chaudry Assistant Referee 1: Austin Reed Assistant Referee 2: Brian Dusablon TMO: Scott Green
Old Glory DC v. San Diego Legion Maryland Soccerplex, Germantown Saturday, March 23, 2024	Referee: George Myers Assistant Referee 1: Kahlil Harrison Assistant Referee 2: Craig Sakowski TMO: Amanda Cox
Miami Sharks v. Anthem Rugby Carolina AutoNation Sports Field, Fort Lauderdale Saturday, March 23, 2024	Referee: Federico Anselmi Assistant Referee 1: Lex Weiner Assistant Referee 2: Tom Ciampa TMO: Derek Summers
Dallas Jackals v. NOLA Gold Choctaw Stadium, Arlington Saturday, March 23, 2024	Referee: Marquise Goodwin Assistant Referee 1: Aaron Davis Assistant Referee 2: Jono Cooper TMO: Scott Green
Chicago Hounds v. New England Free Jacks SeatGeek Stadium, Bridgeview Sunday, March 24, 2024	Referee: Luke Rogan Assistant Referee 1: Moe Chaudry Assistant Referee 2: Andrew Dunn TMO: Amanda Cox
RFC Los Angeles v. Utah Warriors Dignity Health Sports Park, Carson Sunday, March 24, 2024	Referee: Cisco Lopez Assistant Referee 1: Mike Lawrenson Assistant Referee 2: Kirk Swanner TMO: Mike Kelly

(Exhibit M) - Turning down MLR Contract for CRAA



(Exhibit N) Zoom Call



reMarkable - Call with Jamie and Marquise

T

3/25/24 - 10:5pm

- "You're a doggy MF" →
• To Marquise Marquise addressed it

- "You can't ask us for our members money"

- "Spend money on you"

1099 / — — — — —

Lie Nash Bash wasn't sanctioned

(Exhibit O) -

Appointment to

National

Development Group

Email



Justin <justinxhale@gmail.com>

2023-2024 National Development Group

Lee Johnson <referee-assignments@usa.rugby>
Cc: USA Rugby Referee Development <referee-development@usa.rugby>, Jamie McGregor <jmcgregor@usa.rugby>
Bcc: justinxhale@gmail.com

Dear Fellow Referees,

The Pathways Working Group has identified a pool of around 40 referees from across the USA to be part of the **National Development Group (NDG)**. See below for what to expect and what will be required from referees in the group for 2023-2024.

Congratulations on being selected to the NDG for 2023-2024.

This email is your invitation to join the NDG.

If you accept the invitation, please complete the following [NDG Acceptance Form](#) by **Monday, August 28**. To get things started for the year, **please join us for a kick-off call on Tuesday, August 29 at 8:30 PM EST**. We have lots of exciting plans for the year to share! We will send out the registration link to all that accept this invitation.

What USA Rugby commits to providing you:

- Referee Coach.** We will pair you with a referee coach to work one-on-one over the course of the year. The onus will be on you to check in with them on a regular basis throughout the season. Ideally, they will also be able to coach/review you directly on occasion (via Advantage), although that is not always needed. We will contact you about the pairings before they are announced.
- S&C.** We have contracted a dedicated S&C coach (Justin Goonan) to provide a group strength & conditioning plan to all NDG referees, in addition to 25 minutes of one-on-one service each week. This resource will also be able to provide some advice and direction should you have specific requirements, e.g. injury or other personal circumstances preventing you from following the program.
- Radio Vest.** For those of you who did not receive it last season, USA Rugby has partnered with Advantage Referee Communications to provide you all with a Radio Vest you can wear underneath your jersey for when you use comms for matches.
- NDG Referee Jersey.** All NDG referees in 2023-24 will receive a NDG Referee Jersey. This jersey is specific to the NDG; it will be used throughout the year, and should not be traded.
- Eligible to attend USA Rugby Camps** as a member of the NDG you are eligible to attend the regional development camps that are hosted by USA Rugby across various locations at varying times throughout the year.

What you would be committing to:

What you would be committing to:

- Be available for selection in all of the Performance Leagues.** Individual availability for specific matches will be taken into account. Performance Leagues include: D1A, WPL, D1E, NIRA, 7s, relevant National Championships, etc. This includes completing reviews of matches in Advantage, and regular attendance on weekly review calls. Please note that there is no need for you to complete an application form for the Performance Leagues when these are released to the general referee population.
- Attending the Regional Development Group meetings.** These will be held every month on the 4th Tuesday at the following times depending upon your specific region:

East - 7pm Eastern
South - 7pm Central
MidWest - 8pm Central
West - 7pm Pacific / 8pm Mountain
- Completing a Season Development Plan with your coach.** This would need to be entered into Advantage by the middle of September. Your assigned referee coach will help you develop this if needed.
- Maintaining appropriate fitness standards.** We aim to improve the fitness standards of our group overall. All NDG referees must submit Bronco scores within the testing windows: Jan/Feb, May/Jun, Sep/Oct. There is currently no minimum standard to remain in the group, but scores will be tracked and should at a minimum show progress across the year.
- Having an education/coaching/mentoring role with your LRO.** It is important that National-level referees 'give back' to their LROs. This may take the form of presenting an education session, performing a mentoring role for a junior referee, referee coaching less experienced referees in your area, or something similar. Many of you also have formal roles with your LROs, but this request is specifically about providing on-field guidance to lower level referees. You will need to discuss what exact form this will take with your assigned referee coach. Your Regional Development Working Group (DWG) Representative can help you find opportunities to present educational materials. The DWG will be tracking attendance and level of participation at the monthly RDG meetings and will provide feedback to the group following these meetings.

Once again congratulations to you on being selected to the NDG.



LEE JOHNSON
National Referee Assignments Officer
925.522.6024 | [usa.rugby](#) | [referee-assignments@usa.rugby](#)
[f](#) [X](#) [@](#) [d](#) [in](#) [v](#)

(Exhibit P) - Audio

Recording of May 1,

2023 Phone Call

Between Plaintiff and

Jamie McGregor

The accompanying audio file is a recording of a phone call that took place on May 1, 2023, between Plaintiff Justin X. Hale and Defendant Jamie McGregor, Director of Training & Education at USA Rugby. Plaintiff recorded this phone call on May 1, 2023, and it accurately reflects the conversation that took place. This phone call is referenced in Plaintiff's Second Amended Complaint and provides critical evidence of retaliatory and discriminatory conduct by Defendant McGregor.

A transcript of the audio recording is attached as Exhibit B for reference.

The audio file has been submitted as an electronic exhibit in compliance with the Court's filing procedures. The file is provided electronically, uploaded to CM/ECF, and labeled as Exhibit P.

Respectfully submitted,

/s/ Justin X. Hale

Justin X. Hale

Pro Se Plaintiff

CERTIFICATE OF SERVICE

I certify that on Aug 18, 2025 , I electronically filed the foregoing with the Clerk of the Court using the Electronic Submission For Pro Se Filers, and e-mailed a copy of the foregoing on Aug 18, 2025 to:

Philip Robert Brinson
1900 West Loop South, Suite 1000
Houston, Texas 77027
prbrinson@grsm.com

Date: Aug 18, 2025

/s/ Justin X. Hale
Justin X. Hale
2904 Sprouted Grain
Seguin, TX
(979) 703-0894
justinxhale@gmail.com